

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

LEAH WILLIS individually. and on behalf of
all others similarly situated,

Plaintiff,

v.

ASCENSION HEALTH,

Defendant.

Case No. 4:24-cv-0821

NOTICE OF JOINT MOTION TO CONSOLIDATE ACTIONS

Pursuant to Local Rule 4.03, Plaintiff Leah Willis, by and through the undersigned counsel, hereby gives notice that a motion to consolidate has been filed in case number 4:24-cv-0669 [DE 17] seeking consolidation of all related matters.¹ The motion is attached hereto as Exhibit A.

Dated: July 23, 2024

/s/ Norman E. Siegel

Norman E. Siegel, #44378 (MO)

George A. Hanson, #395380 (MO)

J. Austin Moore, #64040 (MO)

STUEVE SIEGEL LLP

460 Nichols Road, Suite 200

Kansas City, MO 64112

Tel: (816) 714-7100

hanson@stuevesiegel.com

moore@stuevesiegel.com

siegel@stuevesiegel.com

¹ To date, thirteen cases have been filed in the Eastern District of Missouri. *Negron v. Ascension Health*, 4:24-cv-00669 (filed May 14, 2024); *Shuta v. Ascension Health*, 4:24-cv-00683 (filed May 16, 2024); *McClellan v. Ascension Health*, 4:24-cv-00686 (filed May 16, 2024); *L.S. v. Ascension Health*, 4:24-cv-00693 (filed May 17, 2024); *Brown et al. v. Ascension Health*, 4:24-cv-00724 (filed May 23, 2024); *Gounaris v. Ascension Health*, 4:24-cv-00727 (filed May 23, 2024); *Radley v. Ascension Health*, 4:24-cv-00748 (filed May 29, 2024); *Willis v. Ascension Health*, 4:24-cv-00821 (filed June 13, 2024); *Gregg v. Ascension Health*, 4:24-cv-00837 (filed June 17, 2024); *Croft v. Ascension Health*, 4:24-cv-00870 (filed June 21, 2024); *Juracek v. Ascension Health*, 4:24-cv-00905 (filed July 1, 2024); *Seney et al. v. Ascension Health*, 4:24-cv-00933 (filed July 9, 2024); and *Hoskins v. Ascension Health*, 4:24-cv-00964 (filed July 15, 2024).

J. Gerard Stranch, IV, #23045 (TN)
Grayson Wells, #73068 (MO)
STRANCH, JENNINGS & GARVEY PLLC
The Freedom Center
223 Rosa L. Parks Avenue, Suite 200
Nashville, TN 37203
Tel: (615) 254-8801
gstranch@stranchlaw.com
gwells@stranchlaw.com

John F. Garvey #35879 (MO)
Colleen Garvey #72809 (MO)
Ellen A. Thomas, #73043 (MO)
STRANCH, JENNINGS & GARVEY PLLC
701 Market Street, Suite 1510
St. Louis, MO 63101
Tel: (314) 390-6750
jgarvey@stranchlaw.com
cgarvey@stranchlaw.com
ethomas@stranchlaw.com

TJ Jesky, #6235691 (IL)
LAW OFFICES OF TJ JESKY
205 N. Michigan Avenue, Suite 810
Chicago, IL 60601
Tel: (312) 894-0130
tj@jeskylaw.com

Gary M. Klinger
**MILBERG COLEMAN BRYSON PHILLIPS
GROSSMAN PLLC**
227 W. Monroe Street, Suite 2100
Chicago, IL 60606
Tel: (866) 252-0878
gklinger@milberg.com

Jeff Ostrow
KOPELOWITZ OSTROW P.A.
One West Las Olas Boulevard, Suite 500
Fort Lauderdale, FL 33301
Tel: (954) 525-4100
ostrow@kolawyers.com

Maureen M. Brady, #57800 (MO)
Lucy McShane, #57957 (MO)

MCSHANE & BRADY LLC

4006 Central Street
Kansas City, MO 64111
Tel: (816) 888-8010
mbrady@mcs Shanebradylaw.com
lmcshane@mcs Shanebradylaw.com

Courtney E. Maccarone

Mark S. Reich

Gary I. Ishimoto

LEVI KORSINKY LLP

33 Whitehall Street, 17th Floor
New York, NY 10004
Tel: (212) 363-7500
cmaccarone@zlk.com
mreich@zlk.com
gishimoto@zlk.com

James J. Rosemergy

CAREY DANIS & LOWE

8235 Forsyth Boulevard, Suite 1100
St. Louis, MO 63105
Tel: (314) 725-7700
jrosemergy@careydanis.com

Don M. Downing

GRAY RITTER PC

701 Market Street, Suite 800
St. Louis, MO 63101
Tel: (314) 241-5620
ddowning@grgpc.com

Sabita J. Soneji

David W. Lawler

TYCKO & ZAVAREEI LLP

1970 Broadway, Suite 1070
Oakland, CA 94612
Tel: (510) 254-6808
ssoneji@tzlegal.com
dlawler@tzlegal.com

Laurence D. King, Esq.

Matthew B. George, Esq.

Blair E. Reed, Esq.

Clarissa R. Olivares, Esq.

KAPLAN FOX & KILSHEIMER LLP

1999 Harrison Street, Suite 1560
Oakland, CA 94612
Tel: (415) 772-4700
lking@kaplanfox.com
mgeorge@kaplanfox.com
breed@kaplanfox.com
colivares@kaplanfox.com

Tiffany Marko Yiatras, #58197 (MO)
CONSUMER PROTECTION LEGAL, LLC
308 Hutchinson Road
Ellisville, MO 63011
Tel: (314) 541-0317
tiffany@consumerprotectionlegal.com

Jean S. Martin
**MORGAN & MORGAN COMPLEX
LITIGATION GROUP**
201 N. Franklin Street, 7th Floor
Tampa, FL 33602
Tel: (813) 223-5505
jeanmartin@forthepeople.com

Thomas E. Loeser
Karin B. Swope
COTCHETT, PITRE & MCCARTHY LLP
999 N. Northlake Way, Suite 215
Seattle, WA 98103
Tel: (206) 970-8181
tloeser@cpmlegal.com
kswope@cpmlegal.com

Francis J. "Casey" Flynn, Jr., #52358 (MO)
LAW OFFICE OF FRANCIS J. FLYNN, JR.
3889A Humphrey Street
Saint Louis, MO 63116
Tel: (314) 662-2836
casey@lawofficeflynn.com

Brian P. Murray
GLANCY PRONGAY & MURRAY LLP
230 Park Avenue, Suite 358
New York, NY 10169
Tel: (212) 682-5340
bmurray@glancylaw.co

Paul C. Whalen, Esq.
LAW OFFICE OF PAUL C. WHALEN P.C.
768 Plandome Road
Manhasset, NY 11030
Tel: (631) 612-3905
pcwhalen@gmail.com

David M. Berger
Linda P. Lam
Sarah E. Hillier
GIBBS LAW GROUP LLP
1111 Broadway, Suite 2100
Oakland, CA 94607
Tel: (510) 350-9700
dmb@classlawgroup.com
lpl@classlawgroup.com
seh@classlawgroup.com

Lynn A. Toops
Amina A. Thomas
COHEN & MALAD LLP
One Indiana Square, Suite 1400
Indianapolis, IN 46204
Tel: (317) 636-6481
ltoops@cohenandmalad.com
athomas@cohenandmalad.com

Brandon M. Wise
PEIFFER WOLF LLP
One US Bank Plaza, Suite 1950
St. Louis, MO 63101
Tel: (314) 883-4827
bwise@pwcklegal.com

Attorneys for Plaintiffs and the Proposed Class

CERTIFICATE OF CONFERENCE

Pursuant to LR 3.04(A), I certify that I conferred with Plaintiff's counsel in each of Actions and counsel for the Defendant, and each agreed to the relief requested in this agreed motion.

Dated: July 23, 2024

/s/ Norman E. Siegel
Norman E. Siegel, #44378 (MO)

CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2024, a copy of the foregoing was served by electronic means via the Court's CM/ECF System on all counsel registered to receive electronic notices.

/s/ Norman E. Siegel
Norman E. Siegel, #44378 (MO)